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Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Case No. 5:20-cv-03664-YGR-SVK

**DECLARATION OF RYAN BLACKHART
IN SUPPORT OF GOOGLE'S
ASSERTION OF PRIVILEGE**

Referral: Hon. Susan van Keulen, USMJ

Defendant.

I, Ryan Blackhart, declare as follows:

1. I am in-house discovery counsel for Google. I make this declaration of my own personal, firsthand knowledge, and if called as a witness, I could and would testify competently thereto.

2. In my role as in-house discovery counsel for Google, I frequently communicate with Google engineers and Google in-house and outside counsel to discuss technical issues related to this case.

3. I am familiar with and was directly involved in preparing GOOG-CABR-03667431 and the communications contained therein between myself, Google outside counsel Josef Ansorge, Google in-house counsel Toni Baker, and Google engineers Chris Liao and Bert Leung.


4. This document is a “Google Docs”-formatted file. Google Docs is a web-based document program that allows multiple people to work in a document at the same time: edits can be seen as they are made, conversations can take place via comments directed to particular individuals and responses thereto. As such, it is common for discussions between Google in-house counsel, Google outside counsel, and non-attorneys to take place in the comments within a given Google document. These comments appear on the right-hand side of the document and are preceded by the word “Commented” followed by a number in brackets.

5. In Comment 3, I was added to a conversation between outside counsel Josef Ansorge and Google engineer Bert Leung regarding legal advice related to Google’s collection and retention of certain data, which is reflected by the inclusion of a plus sign and my corporate email address (“+blackhart@google.com”) in this comment.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed in San Francisco, CA on March 14, 2022.

DATED: March 14, 2022

By  Ryan Blackhart
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